

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

COALITION TO MARCH ON THE RNC,

Plaintiff,

v.

Case No. 24-CV-704

CITY OF MILWAUKEE,
CAVALIER JOHNSON in his official capacity
as Mayor of the City of Milwaukee, and
JERREL KRUSCHKE in his official capacity as
Commissioner of Public Works for the City of Milwaukee,

Defendants.

**DECLARATION OF MAYORIAL CHIEF OF STAFF
NICK DeSIATO**

STATE OF WISCONSIN)

MILWAUKEE COUNTY)

I, Nicholas DeSiato hereby make the following declaration:

1. I am an adult resident of the State of Wisconsin.
2. At all times relevant to the above-captioned matter, I have been employed by the City of Milwaukee, ("City"), and as Chief of Staff to Mayor Cavalier Johnson since November of 2022.
3. I have reviewed the Declarations of Audrey Gibson Cicchino and Jerrel Kruschke, and other pertinent records to refresh my recollection and to ensure that the information and details included here are true, accurate, and correct.
4. This declaration is made in support of Defendants' response to Plaintiff's motion for a preliminary injunction in the above-captioned matter.

5. I have been involved in the City's efforts to plan the 2024 Republican Nominating Convention ("RNC") to be held in the City from July 15-18.
6. As part of the City's planning efforts, I familiarized myself with recent prior nominating conventions, including visiting various host cities and speaking to persons previously involved in planning to host such an event.
7. In preparation for the RNC, the office of Mayor Cavalier Johnson, along with the Department of Public Works, the Milwaukee Police Department, and other City agencies have been involved with the effort to implement the provisions of the Extraordinary Event ordinance, ("Ordinance"), adopted by the Milwaukee Common Council on March 19, 2024. (ECF No. 7-6, p. 1-5)
8. I am also familiar with the planning process undertaken by the United States Secret Service, ("Secret Service"), for National Special Security Events, ("NSSE") like the RNC. In connection with an NSSE, including the RNC, the Secret Service will establish the vehicle screening zone and a secure perimeter.
9. The vehicle screening zone and secure perimeter are generally not publicly announced by the Secret Service until approximately two to four weeks prior to the start of an NSSE.
10. Plaintiff filed three applications under MCO § 105-55.5, the City's Special Event Permit Ordinance. (Kruschke Decl. ¶¶ 7-10)
11. The Coalition filed an application under the Ordinance on April 17, 2024, expressing a desire to conduct a parade on the official parade route. (A copy of the data Plaintiff entered on the portal to apply for use of the official parade route and speaker's platform is attached as Exhibit 1.) Plaintiff did not request the use

of the official speaker's platform in its application. Plaintiff indicated their stated preference for utilizing the official parade route within the parameters set by the City, indicating their preferred date was Monday, July 15, and preferred time was 11 a.m. to 3 p.m. (as opposed to 3 p.m. to 7 p.m.).

12. On Friday, June 21, 2024, I participated in a press conference with the Secret Service. (*See*, Exhibit 2 for a copy of an associated Press Release.) At this press conference, the Secret Service publicly revealed the vehicle screening zone, including the secure perimeter that lies within it. The City also announced the Official Parade Route and the Official Speaker's Platforms it was required to establish pursuant to the Ordinance. The vehicle screening zone, secure perimeter, Official Parade Route, and Official Speaker's Platforms are appended to the Kruschke Declaration. (Kruschke Decl. ¶ 11, Ex. 5)
13. Specifically, the "North" Official Speaker's Platform will consist of a raised platform with provided sound amplification equipment on Doctor MLK Jr. Drive at McKinley Avenue, facing west. Southbound traffic will be blocked, and parking restricted, heading south on both Vel R. Phillips Avenue and Doctor MLK Jr. Drive at Vliet, in order to provide safe access to the Official Speaker's Platform, and to create a Public Viewing Area along the northern sidewalk on McKinley and on the roadway on Vel R. Phillips. The Official Speaker's Platform will be approximately 150 feet from the eastern delegate bus lot. The southwestern-most portion of the Public Viewing Area at Vel R. Phillips Avenue is no less than 100 feet from the western delegate bus lot, and fewer than 550 feet from the Deer District/Fiserv Forum entrances, (attendees will line up for

screening at Juneau Avenue). Both the Public Viewing Area and the Official Speaker's Platform feature direct sight lines to the Fiserv Forum.

14. The South Official Speaker's Platform will be located within Zeidler Union Square, ("Zeidler"), bounded by Michigan Street on the north, Doctor MLK Jr. Drive on the east, Everett Street on the south, and Vel R. Phillips Avenue on the west. The City will provide sound amplification in the already standing gazebo located in the park. Zeidler lies one block south and one block east of the Baird Center (the media filing center and home to some RNC events). Zeidler is the South Public Viewing Area.
15. The City obtained a permit for the use of Zeidler from Milwaukee County. Note that two other parks within or near the vehicle screening zone, Pere Marquette and Red Arrow, are also owned by the County. The City does not have a permit from the County to use either Pere Marquette or Red Arrow Park during the RNC. Although the City explored the possibility of obtaining a permit from the County to use Pere Marquette Park, it abandoned that plan when negative public statements about that location, including from the Coalition to March on the RNC, were expressed, and the City efforted to place the official speaker's platforms closer to the secure perimeter.
16. The Official Parade Route will also utilize Zeidler Union Square as a staging area (east side of the park). The Official Parade Route will proceed east on Michigan Street, north on 2nd Street, east on Wisconsin Avenue to Plankinton Avenue, then south to Clybourn Street, west to 5th Street, and then north to an area adjacent to

Vel R. Phillips Plaza, proceed to the east to Vel R. Phillips Avenue, before turning south and concluding at the western half of Zeidler.

17. In light of the June 21 announcements, and because the City is providing two Official Speaker's Platforms, the e-mail (attached as Exhibit 3) has been sent to Plaintiff and anyone else who previously applied through the portal, allowing them to express a preference for the North or South Official Speaker's Platform, before 12 p.m. on Wednesday, June 26. Beginning at 5:00 p.m. on Wednesday, June 26, and no later than July 1, 2024, the City shall inform applicants of their assigned date/start time for use of the Official Parade Route and Official Speaker's Platform. The portal and the City's FAQ's have also been updated in light of today's announcements. (Kruschke Decl. ¶ 12, Exs. 6 and 7) The FAQ's also contain extensive information about the public impact of today's announcements, including street closures. (Portions of the FAQ related to these matters are reproduced in Exhibit 4).

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 21, 2024.

s/Nicolas DeSiato

NICOLAS DeSIATO

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